

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY <b>Caption in Compliance with D.N.J. LBR 9004-2(c)</b>	
<b>RABINOWITZ, LUBETKIN &amp; TULLY, LLC</b> 293 Eisenhower Parkway, Suite 100 Livingston, NJ 07039 (973) 597-9100 Jonathan I. Rabinowitz Barry J. Roy <i>Proposed Counsel for Chapter 7 Trustee</i>	
In re:  IMMUNE PHARMACEUTICALS INC.,  Debtor.	Case No. 19-13273 (VFP)  Chapter 7  Jointly Administered
In re:  IMMUNE PHARMACEUTICALS, USA CORP.,  Debtor.	Case No. 19-13889 (VFP)  Chapter 7
In re:  IMMUNE PHARMACEUTICALS, LTD.,  Debtor.	Case No. 19-13710 (VFP)  Chapter 7
In re:  CYTOVIA, INC.,  Debtor.	Case No. 19-13896 (VFP)  Chapter 7

In re:  IMMUNE ONCOLOGY PHARMACEUTICALS, INC.,  Debtor.	Case No. 19-13898 (VFP)  Chapter 7
In re:  MAXIM PHARMACEUTICALS, INC.,  Debtor.	Case No. 19-13899 (VFP)  Chapter 7

Recommended Local Form:	<input checked="" type="checkbox"/> Followed	<input type="checkbox"/> Modified
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**APPLICATION FOR RETENTION OF  
BEDERSON LLP AS ACCOUNTANT TO CHAPTER 7 TRUSTEE**

1. The applicant, Jeffrey A. Lester, is the  
☒ Trustee:                      ☒ Chap. 7                      ☐ Chap. 11                      ☐ Chap. 13.  
☐ Debtor:                      ☐ Chap. 11                      ☐ Chap. 13  
☐ Official Committee of \_\_\_\_\_
2. The applicant seeks to retain the following professional, Bederson LLP (“Bederson”), to serve as:  
☐ Attorney for:                      ☐ Trustee                      ☐ Debtor-in-Possession  
☐ Official Committee of \_\_\_\_\_  
☒ Accountant for:                      ☒ Trustee                      ☐ Debtor-in-possession  
☐ Official Committee of \_\_\_\_\_

☐ Other Professional:

☐ Realtor ☐ Appraiser ☐ Special Counsel

☐ Auctioneer ☐ Other (specify): \_\_\_\_\_

3. The employment of the professional is necessary because the Trustee requires forensic and general accounting services during the pendency of the case.
4. The professional has been selected because of their considerable experience in the field of forensic and general accounting. The Trustee believes that Bederson is well qualified to provide the necessary accounting services in this Chapter 7.
5. The professional services to be rendered are as follows:
  - a. provide audit services if and when requested;
  - b. review the transactions entered into by the Debtor prior to and subsequent to the filing and provide consulting and accounting services as may be requested;
  - c. assist the Trustee in the review of claims and distributions of funds;
  - d. provide expert testimony as may be requested;
  - e. consult with counsel in connection with matters relating to the past activities of the Debtor, including possible post-petition operations;
  - f. consult with and assist the Trustee and his counsel in connection with the prosecution on any and all claims against third parties, and provide testimony, as warranted;
  - g. provide tax counseling, prepare all necessary tax returns, and perform related services; and
  - h. performing such other accounting services for the Trustee as may be

necessary and appropriate herein.

6. The proposed arrangement for compensation is as follows:

Compensation on an hourly basis as approved by the Court upon the filing of fee applications and as more fully set forth in the Certification of Professional in Support of Application for Retention of Professional filed simultaneously herewith.

7. To the best of the applicant's knowledge, the professional's connection with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☐ None

☒ Describe connection:

Bederson has performed services for the Trustee and/or Counsel in other matters completely unrelated to this case. Matthew Schwartz was the proposed Chief Restructuring Officer (CRO) in the Chapter 11 but was not retained.

8. To the best of the applicant's knowledge, the professional (check all that apply):

☒ does not hold an adverse interest to the estate.

☒ does not represent an adverse interest to the estate.

☒ is a disinterested person under 11 U.S.C. § 101(14).

☒ does not represent or hold any interest adverse to the debtor(s) or the estate with respect to the matter for which he/she will be retained under 11 U.S.C. § 327(e).

☐ Other; explain:

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9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows:

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Wherefore, the applicant respectfully requests authorization to employ the professional to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may hereafter determine and allow.

Date: April 13, 2020

/s/ Jeffrey A. Lester  
Signature of Applicant

Jeffrey A. Lester, Chapter 7 Trustee  
Name of Applicant

-and-

**RABINOWITZ, LUBETKIN & TULLY, LLC**  
*Proposed Counsel to Chapter 7 Trustee*

By: /s/ Barry J. Roy  
Barry J. Roy